

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Cynthia M. Newcomer
500 West Brown Street
Lock Haven, PA 17745

Plaintiff,

vs.

Verizon Pennsylvania
500 Technology Drive
Weldon Spring, MO 63304

and

John Does 1-10

and

X, Y. Z Corporations

Defendants.

CIVIL ACTION

No.

JURY TRIAL DEMANDED

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441(a) and 1446, and 15 U.S.C. § 1681p, Defendant Verizon Pennsylvania (“Verizon”), by and through its counsel, Christopher H. Wright & Associates, P.C., hereby files this Notice of Removal of this case from the Court of Common Pleas of Clinton County Pennsylvania to the United States District Court for the Eastern District of Pennsylvania. In support of this Notice of Removal, Verizon states as follows:

1. Verizon is a defendant in a civil action brought against it in the Court of Common Pleas of Clinton County, Pennsylvania styled *Cynthia M. Newcomer v. Verizon Pennsylvania*, Case No. 699-2011 on the docket of said court. Copies of all process and pleadings served upon Verizon in that action are attached as Exhibit “A” pursuant to 28 U.S.C. § 1446(a).

2. On October 11, 2011, the First Amended Complaint in the *Newcomer v. Verizon* action was filed.

3. This Notice of Removal is filed within thirty days of Verizon’s receipt of the First Amended Complaint, the initial pleading setting forth the claim for relief upon which such action is based, as required by 28 U.S.C. § 1446(b).

4. This Notice of Removal has been served on Plaintiffs' counsel. A Notice of Filing of Notice of Removal to Federal Court, attached as Exhibit "B," will be filed in the Court of Common Pleas of Clinton County as soon as this Notice of Removal has been filed in this Court, as required by 28 U.S.C. § 1446(d).

5. Plaintiff's First Amended Complaint sets forth one claim, alleging a violation of the Fair Credit Reporting Act, 15 U.S.C. 1681, et seq. ("FCRA").

6. 28 U.S.C. § 1331 provides that "[t]he district courts shall have original jurisdiction of all civil actions arising under the Constitution, laws, or treaties of the United States."

7. 15 U.S.C. § 1681p provides in pertinent part that "[a]n action to enforce any liability created under [the FCRA] may be brought in any appropriate United States district court, without regard to the amount in controversy, or in any other court of competent jurisdiction..."

8. The one and only claim asserted by Plaintiff – an alleged violation of the FCRA – arises under federal law, therefore this Court has Federal Question jurisdiction over this action pursuant to 28 U.S.C. § 1331 and removal is required. See also Haun v. Retail Credit Co., 420 F. Supp. 859 (W.D. Pa. 1976) (provision of FCRA that suit "may be brought in any appropriate United States District Court without regard to amount in controversy, or in any other court of competent jurisdiction" does not amount to a prohibition against removal of a case to federal District Court, since permitting a suit to be "brought" in a particular court allows the plaintiff to commence an action in that court, but it does not connote an assurance that he will be able to keep it there).

WHEREFORE, Verizon hereby removes this action from the Court of Common Pleas of Clinton County to this Court pursuant to 28 U.S.C. §§ 1331, 1441(a) and 1446, and 15 U.S.C. § 1681p.

BY:

A handwritten signature in black ink, appearing to read 'Christopher H. Wright', is written over a horizontal line.

CHRISTOPHER H. WRIGHT, ESQUIRE
Attorney for Defendant, Verizon Pennsylvania, Inc.
Attorney Identification No. 27091
Christopher H. Wright & Associates, P.C.
West Valley Business Center
940 West Valley Road, Suite 1904
Wayne, PA 19087
Phone: 610-688-2526
Fax: 610-688-2744

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Cynthia M. Newcomer
500 West Brown Street
Lock Haven, PA 17745

Plaintiff,

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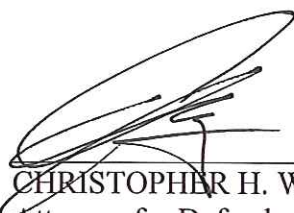
JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

I, Christopher H. Wright, Esquire, hereby certify that service of a true and correct copy of Notice of Removal was made via U. S. First Class Mail to counsel below on November 18, 2011.

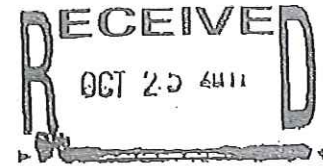
Vicki Piontek, Esquire
951 Allentown Road
Lansdale, PA 19446

BY:



CHRISTOPHER H. WRIGHT, ESQUIRE
Attorney for Defendant, Verizon Pennsylvania, Inc.
Attorney Identification No. 27091
Christopher H. Wright & Associates, P.C.
West Valley Business Center
940 West Valley Road, Suite 1904
Wayne, PA 19087
Phone: 610-688-2526
Fax: 610-688-2744

Exhibit A



IN THE COURT OF COMMON PLEAS
OF CLINTON COUNTY, PENNSYLVANIA
CIVIL ACTION-LAW

Cynthia M. Newcomer
500 West Brown Street
Lock Haven, PA 17745

Plaintiff

699-2011

Vs.

VERIZON PENNSYLVANIA
500 TECHNOLOGY DR
WELDON SPRING, MO 63304

and

John Does 1-10

and

X,Y,Z Corporations

Defendant(s)

Jury Trial Demanded,

FILED
CLINTON COUNTY, PA
2011 OCT 11 P 1:30
SUPERIOR COURT

NOTICE TO DEFEND

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served by entering a written appearance personally or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice to you for any money claimed in the Complaint or for any other claim or relief requested by Plaintiff(s). You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Mid Penn Legal Services
2054 E College Ave
State College, PA 16801
814-238-4958

IN THE COURT OF COMMON PLEAS
OF CLINTON COUNTY, PENNSYLVANIA
CIVIL ACTION-LAW

Cynthia M. Newcomer
500 West Brown Street
Lock Haven, PA 17745

Plaintiff

Vs.

VERIZON PENNSYLVANIA
500 TECHNOLOGY DR
WELDON SPRING, MO 63304

and

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and

X,Y,Z Corporations

Defendant(s)

699-2011

Jury Trial Demanded

FILED
CLINTON COUNTY, PA
2011 OCT 11 P 1:30
SHEPHERD
PROTECTOR

PLAINTIFF'S FIRST AMENDED COMPLAINT

INTRODUCTION

1. This is a lawsuit for damages brought by an individual consumer for Defendant(s)' alleged violations of the Fair Credit Reporting Act, 15 U.S.C. 1681, et seq. (hereinafter "FCRA").

JURISDICTION AND VENUE

2. All previous paragraphs of this complaint are incorporated by reference and made a part of this complaint
3. A substantial portion of the conduct complained of occurred in this jurisdiction.
4. Plaintiff resides in this jurisdiction.
5. This Court has federal question jurisdiction pursuant to 28 USC 1331 and 15 USC 1681, et. seq.
6. Venue is proper in this District because Defendant(s) do(es) business in this jurisdiction and avails itself of the benefits of the market in this jurisdiction.
7. Jurisdiction for this action is asserted pursuant to 28 U.S.C. §1334-1337.
8. Venue lies in this District pursuant to 28 U.S.C. §1392(b).
9. Declaratory relief is available pursuant to 28 U.S.C 2201 and 2202.

PARTIES

10. All previous paragraphs of this complaint are incorporated by reference and made a part of this complaint.

11. Plaintiff is Cynthia M. Newcomer, an adult individual with a current address of 500 West Brown Street, Lock Haven, PA 17745.

12. Defendants are the following individuals and business entities.

- a. VERIZON PENNSYLVANIA, a business entity with a principal place of business located at 500 TECHNOLOGY DR , WELDON SPRING, MO 63304
- b. John Does 1-10, individuals or business entities whose identities are not known to Plaintiff at this time, but which will become known upon proper discovery. It is believed and averred that such Does played a substantial role in the commission of the acts described in this complaint.
- c. X,Y,Z Corporations, business identities whose identities are not known to Plaintiff at this time, but which will become known upon proper discovery. It is believed and averred that such entities played a substantial role in the commission of the acts described in this complaint.

**COUNT ONE: Violation of Fair Credit Reporting Act (FCRA)
15 USC 1681 et. seq.
Verifying Account Without Proper Written Verification**

13. All previous paragraphs of this complaint are incorporated by reference and made a part of this complaint.
14. At all times mentioned herein Plaintiff was a consumer as defined by the FCRA.
15. At all times mentioned herein Defendant was a furnisher of information as defined by the FCRA.
16. At various times in writing, Plaintiff contacted Defendant about and alleged consumer debt that appeared on her credit report.
17. The alleged consumer debt had been placed on Plaintiff's credit report by Defendant, and Defendant was therefore a furnisher of information for purposes of the FCRA.

18. 15 USC 1681 s-2 requires a furnisher to conduct a reasonable investigation of an account which appears on a consumer's credit report, upon written request of the consumer to do so.
19. The United States Court of Appeals for the Fourth Circuit held that the FCRA requires furnisher to conduct detailed examinations of the documents underlying customer transactions before responding to inquiries about a customer's debt, instead of relying on computer databases that provide convenient but potentially incomplete or inaccurate customer account information. See *Johnson v. MBNA America Bank*, No. 03-1235 (February 11, 2004).
20. At various times in writing, Plaintiff requested that Defendant conduct an investigation about the alleged consumer debt that appeared on Plaintiff's credit report.
21. Defendant(s) failed and willfully refused to conduct an investigation of Plaintiff's account in violation of Defendant's duties pursuant of 15 USC 1681 s-2 et. seq.
22. After Defendant(s) failed and willfully refused to conduct and investigation of Plaintiff's account, Defendant(s), Plaintiff was left with no other recourse than to dispute the account with the relevant credit reporting agency(ies) (CRAs).

23. After Plaintiff disputed the account with the relevant credit reporting agencies(s), Defendant then verified the alleged account with the relevant credit reporting agencies, Defendant(s) despite having willfully refused to conduct an investigation of Plaintiff's account in violation of Defendant's duties pursuant of 15 USC 1681 s-2 et. seq.
24. Upon information and belief, it is averred that Defendant(s) have a standard practice policy which contradicts it's duties pursuant to 15 USC 1661 s-2.
25. Plaintiff bring this action under 15 USC 1681 s-2(b), as distinguished from 15 USC 1681s-2(a).
26. There is no private cause of action under 15 USC 1681s-2(a). Only the government can bring a cause of action under 15 USC 11681 s-2(a). For example, the Attorney General could bring a claim on behalf of consumers under 15 USC 1681s-2(a).

27. But there is a private cause of action under 15 USC 1681s-2(b). See the following case law which distinguishes between the government right of action under 15 USC 1681s-2(a), and the private cause of action under 15 USC 1681s-2(b).

Beisel v. ABN Ambro Mortgage, Inc., No. 07-2219, 2007 WL2332494, *1 (E.D. Pa. Aug. 10, 2007).

The Court granted furnisher's motion to dismiss and noted that it is well established that to prevail on a FCRA claim Plaintiff "must prove [he] notified a credit reporting agency of the dispute, the credit reporting agency then notified the furnisher of information, and the furnisher of information failed to investigate or rectify the disputed charge.").

Marshall v. Swift River Academy, LLC, 2009 WL 1112768 (9th Cir. 2009).

The Court ruled that a consumer had no private right of action under FCRA against furnisher for its failure to provide accurate information to consumer reporting agencies.

Catanzaro v. Experian Information Solutions, Inc., 671 F. Supp.2d 256, 260 (D. Mass. 2009). The Court ruled that notification by consumer reporting agency to information furnisher was prerequisite for furnisher liability under FCRA.

Kaetz v. Chase Manhattan Bank, 2007 WL 1343700, *3 (M.D. Pa. 2006). The Court dismissed the complaint, but only because Plaintiff failed to allege that he disputed the accuracy of his debts to a credit agency, or that the credit agency thereafter reported dispute to defendant.

28. Because Plaintiff first disputed the account with Defendant, and then disputed the account with the credit reporting agency afterwards, and then Defendant(s) verified the derogatory information to the Credit Reporting Agency without conducting a proper investigation, Plaintiff does have a private cause of action against Defendant under these particular circumstances.

LIABILITY

29. All previous paragraphs of this complaint are incorporated by reference and made a part of this complaint.

30. Defendant(s) is liable for the acts committed by its agents under the doctrine of respondeat superior because Defendant's agents were acting within the scope of their employment with Defendant.

31. In the alternative, Defendant(s) is liable for the conduct of its agents / employees under the theory of joint and several liability because Defendant and its agents / employees were engaged in a joint venture and were acting jointly and in concert.

32. Any mistake made by Defendant would have included a mistake of law.

33. Any mistake made by Defendant would not have been a reasonable or bona fide mistake.

DAMAGES

34. All previous paragraphs of this complaint are incorporated by reference and made a part of this portion of the complaint.
35. At least \$1.00 actual damages for Plaintiff, including but not limited to phone, fax, stationary, postage, etc.
36. \$1,000.00 statutory damages Plaintiff pursuant to 15 USC 1681 et. seq.
37. Plaintiff suffered emotional distress, anger, frustration and confusion as a result of Defendant's illegal collection activity in an amount to be determined at trial.
38. For purposes of a default judgment, Plaintiff believes and avers that such anger, distress and confusion has a Dollar value to be proven at trial.
39. Defendant's conduct was willful, wanton and intentional, and therefore Plaintiff requests punitive damages in an amount of no less than \$10,000.00.

ATTORNEY FEES

40. All previous paragraphs of this complaint are incorporated by reference and made a part of this complaint.

41. Plaintiff is entitled to attorney fees pursuant to 15 USC 1681 et. seq., in the amount of \$1,750.00 at a rate of \$350.00 per hour, enumerated below.

- | | |
|---|---|
| a. Consultation with client. Numerous meetings. Drafting of dispute letters | 2 |
| b. Drafting, editing, review of complaint and related documents. Organizing Exhibits and filing complaint and related documents | 1 |
| c. Follow up contact with Defense | 2 |

5 x \$350 = \$1,750.00

42. Plaintiff's attorney fees continue to accrue as the case move forward.

43. The above stated attorney fees are for prosecuting this matter and reasonable follow up.

OTHER RELIEF

44. All previous paragraphs of this complaint are incorporated by reference and made a part of this portion of the complaint.

45. Plaintiff seeks injunctive relief barring further unlawful credit reporting and / or unlawful collection activity.

46. Plaintiff seeks such other relief as this Honorable Court may deem just and proper.

JURY TRIAL

47. All previous paragraphs of this complaint are incorporated by reference and made a part of this portion of the complaint.

48. Plaintiff requests a jury trial in this matter.

49. Plaintiff demands a jury trial in this matter

Wherefore, Plaintiff demands judgment against Defendant(s) in the amount of no less than \$12,750.00 as enumerated below.

\$1.00 more or less actual damages.

\$1,000.00 statutory damages pursuant to 15 USC 1681 et. seq.

\$1,750 attorney fees

\$10,000 punitive damages

\$12,750.00

Plaintiff seeks such additional relief as the Court deems just and proper.

Vicki Piontek
Vicki Piontek, Esquire
Supreme Court ID Number 83559
Attorney for Plaintiff
951 Allentown Road
Lansdale, PA 19446
717-533-7472
Fax: 866-408-6735
palaw@justice.com

10/6/2011
Date

EXHIBITS

11/13/10 11:50 AM

Experian - Printable Full Report

Account History:
Collection as of Jan 2010**VERIZON PENNSYLVANIA**

Address: 500 TECHNOLOGY DR
WELDON SPRING, MO 63304
(877) 325-5156
Account Number: 570748092....
Address Identification Number: 0037654545
Status: Debt included in Bankruptcy.

Status Details: This account is scheduled to continue on record until Feb 2015.

Date Opened: 02/2008
Reported Since: 05/2008
Date of Status: 06/2008
Last Reported: 01/2010
Type: Utility
Terms: 1 Months
Monthly Payment: \$0
Responsibility: Individual
Creditor's Statement: Account closed at credit grantor's request.

Credit Limit/Original Amount: Unknown
High Balance: NA
Recent Balance: \$0 as of 01/2010
Recent Payment: \$0

Account History:
May 2008
Debt included in Bankruptcy on June 30, 2008

VERIZON PENNSYLVANIA

Address: 500 TECHNOLOGY DR
WELDON SPRING, MO 63304
(877) 325-5156
Account Number: 570748092....
Address Identification Number: 0037654545
Status: Debt included in Bankruptcy.

Status Details: This account is scheduled to continue on record until Apr 2016.

Date Opened: 06/2008
Reported Since: 12/2009
Date of Status: 12/2009
Last Reported: 01/2010
Type: Utility
Terms: 1 Months
Monthly Payment: \$0
Responsibility: Individual
Creditor's Statement: Account closed at credit grantor's request.

Credit Limit/Original Amount: Unknown
High Balance: NA
Recent Balance: \$0 as of 01/2010
Recent Payment: \$0

Account History:
Debt included in Bankruptcy on Dec 31, 2009

VERIZON WIRELESS

Address: PO BOX 26055
MINNEAPOLIS, MN 55426
(800) 852-1922
Account Number: 6206335290....

Cynthia M. Newcomer
500 West Brown Street
Lock Haven, PA 17745

VERIZON WIRELESS-MIDANTIC ATLANTIC
P.O. Box 761
Attn: Customer Financial Services
Bedminster, NJ-07921

BY CERTIFIED U.S. MAIL

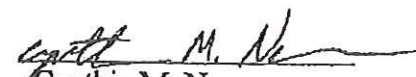
Re: Cynthia M. Newcomer SSN: [REDACTED]
Reference / Account No. 6206335290XXXX
Alleged Balance \$375

DISPUTE

I wish to dispute the above referenced account. I am requesting proof of the alleged debt. I request a copy of the initial contract, and proof of late fees, interest, etc.

This is a disputed account, and you must mark it as disputed on my credit report.

Sincerely,


Cynthia M. Newcomer


Date

U.S. Postal Service
CERTIFIED MAIL... RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)
For delivery information visit our website at www.usps.com

OFFICIAL U.S.

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark Here

Sent to Verizon Wireless
Mid-Atlantic Atlantic
Street Apt. No. or PO Box No. ATN: Customer Financial
Services
P.O. Box 761 Bedminster, NJ 07921

925 5922 0000 0907 DTB

Cynthia M. Newcomer
500 West Brown Street
Lock Haven, PA 17745

VERIZON PENNSYLVANIA INC.
500 TECHNOLOGY DR STE 300
WELDON SPRING, MO-63304-2225

BY CERTIFIED U.S. MAIL

Re: Cynthia M. Newcomer SSN: [REDACTED]
Reference / Account No. 570748092XXXX
Alleged Balance \$68

DISPUTE AND REQUEST FOR INVESTIGATION

I wish to dispute the above referenced account. I am requesting proof of the alleged debt. I request a copy of the initial contract, and proof of late fees, penalties, etc.

I am requesting an investigation of this account.

This is a disputed account, and you must mark it as disputed on my credit report.

Sincerely,

Cynthia M. Newcomer
Cynthia M. Newcomer

1/31/11
Date

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only: No Insurance Coverage Provided)
For delivery information visit our website at www.usps.com

OFFICIAL USE	
Postage	\$
Car/Red Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark Here

Sent to
Verizon Pennsylvania, INC.
500 Technology Dr Ste 300
Weldon Spring, MO-63304-2225

7010 1060 0000 2371 6457

U.S. Postal Service CERTIFIED MAIL - RECEIPT (Domestic Mail Only, No Insurance Coverage Provided)	
For delivery information visit our website at www.usps.com	
OFFICIAL USE	
Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Registered Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$
Postmark Here	
To: Verizon Pennsylvania, INC	
Street Apt. No. 500 Technology Drive	
or PO Box No. 300	
City State ZIP+4® Weldon Spring MO 63304	

Cynthia M. Newcomer
500 West Brown Street
Lock Haven, PA 17745

VERIZON PENNSYLVANIA INC.
500 TECHNOLOGY DR STE 300
WELDON SPRING, MO-63304-2225

BY CERTIFIED U.S. MAIL

Re: Cynthia M. Newcomer SSN: [REDACTED]
Reference / Account No. 570748092XXXX
Alleged Balance \$68

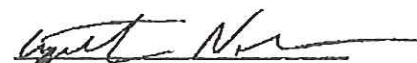
DISPUTE AND REQUEST FOR INVESTIGATION

I wish to dispute the above referenced account. I am requesting proof of the alleged debt. I request a copy of the initial contract, and proof of late fees, interest, etc.

I am requesting an investigation of this account.

This is a disputed account, and you must mark it as disputed on my credit report.

Sincerely,


Cynthia M. Newcomer

12/21/10
Date

Cynthia M. Newcomer
500 West Brown Street
Lock Haven, PA 17745
(570) 337-5715

Experian
P.O. Box 2002
Allen, TX 75013

Re: Cynthia M. Newcomer SSN: [REDACTED]
Verizon Reference / Account No. 6206335290XXXX
Alleged Balance \$375

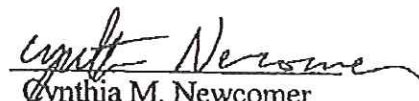
DISPUTE AND REQUEST FOR INVESTIGATION

Dear Experian:

I wish to dispute the above referenced account. The charges are excessive and inflated. The charges are not warranted by any existing contract.

I am requesting an investigation of this matter pursuant to the Fair Credit Reporting Act, 15 USC 1681 et. seq.

Sincerely,


Cynthia M. Newcomer


Date

03/25/2011 11:34

5703238558

WBDA

PAGE 13

Prepared for: CYNTHIA M NEWCOMER
 Date: February 22, 2011
 Report number: 3242-9395-12



Page 1 of 2

Investigation results

About our dispute verification process

This summary shows the revision(s) made to your credit file as a result of the verification we recently completed. If you still question an item, then you may want to contact the source of the information.

- The federal Fair Credit Reporting Act states that you may:
- request a description of how we verified the information, including the business name and address contacted and the telephone number if reasonably available;
 - add a statement disputing the accuracy or completeness of the information; and
 - request that we send these results to organizations who have reviewed your credit report in the past two years for employment purposes or six months for any other purpose.
- If no information follows, our response appeared on the previous page.

How to read your results

Deleted - This item was removed from your credit report.

Remains - This item has been verified as accurate.

Updated - A change was made to this item; review this report to view the change. If

ownership of the item was disputed, then it was verified as belonging to you.

Investigated - This item was either updated or deleted; review this report to learn its outcome.

Results

We completed investigating any items you disputed with the sources of the information and processed any other requests you made. Here are the results:

Credit items	Outcome
VERIZON WIRELESS 6206335290....	Updated

Visit experian.com/status to check the status of your pending disputes at any time.

Additional information

To view a full copy of your corrected credit report, visit experian.com/viewreport

- ☐ To receive a copy by mail, check this box and within 30 days return this original page to P.O. Box 9701, Allen, TX 75013.

Copies will not be accepted.

What's your credit score?

Find out by ordering your VantageScore® from Experian for only \$7.95. To order, call 1 888 322 5583.

By law, we cannot disclose certain medical information (relating to physical, mental, or behavioral health or condition). Although we do not generally collect such information, it could appear in the name of a data furnisher (i.e. "Cancer Center") that reports your payment history to us. If so, those names display on your report, but on reports to others, they display only as MEDICAL PAYMENT DATA. Consumer statements included on your report at your request that contain medical information are disclosed to others.

0001589 0148 0378 **AUTO 0 07101 17745-391600 -C01-001250-1
 CYNTHIA M NEWCOMER
 600 WEST BROWN ST
 LOCK HAVEN PA 17745-3916



PO Box 9701
 Allen, TX 75013

0158653617

05/16/2011 15:25 5703230550

WBDA

PAGE 02

IN THE COURT OF COMMON PLEAS
OF CLINTON COUNTY, PENNSYLVANIA
CIVIL ACTION-LAW

Cynthia M. Newcomer
500 West Brown Street
Lock Haven, PA 17745

Plaintiff

Vs.

VERIZON PENNSYLVANIA
500 TECHNOLOGY DR
WELDON SPRING, MO 63304

and

John Does 1-10

and

X,Y,Z Corporations

Defendant(s)

VERIFICATION

I, Cynthia M. Newcomer affirm that the statements contained in the attached complaint are true and correct to the best of my knowledge understanding and belief.

Cynthia M. Newcomer 5/16/11
Cynthia M. Newcomer

FILED
CLINTON COUNTY, PA
OCT 11 P 1:30
SHERRY L. WILSON
PROTHONOTARY & CLERK

Exhibit B

